

## **The Honorable John H. Chun**

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

REBECCA CHAN,

Plaintiff,

VS.

**SECURE FREIGHT SYSTEMS (U.S.A.), INC.**, a corporation registered in the State of Washington, and **MAPLE FREIGHT PARTNERSHIP**, a corporation registered in the province of British Columbia, and **KIT BONNIE CHU**, a resident of British Columbia,

## Defendant

No. 2:22-CV-01272-JHC

**STIPULATION, DECLARATION  
AND ORDER TO AUTHORIZE  
ALTERNATIVE MEANS OF  
SERVICE UNDER FRCP RULE 4**

**[CLERK'S ACTION REQUIRED]**

## NOTE ON MOTION CALLENDAR

NOVEMBER 18, 2022

## I. STIPULATION

COME NOW, the parties to this action with the unserved Defendants, Kit Bonnie Chu and Maple Freight Partnership, all of whom hereby stipulate to the entry of the attached [Proposed] Order to Authorize Alternative Means of Service under FRCP Rule 4, allowing service of process in this matter by registered mail upon unserved Defendant Kit Bonnie Chu, a Canadian resident, and unserved Defendant Maple Freight Partnership, a Canadian partnership, pursuant to FRCP Rule 4(f)(3) and Article 10(a) of the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents (“Hague Convention”).

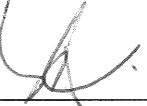
DATED this 18<sup>th</sup> Day of November 2022.

1 /s/ Alex Buerger

2 Alex Buerger, WSBA #25014  
3 318 6<sup>th</sup> Ave. S #126  
4 Seattle, WA 98104  
5 Ph. 206-405-4520  
6 Email: [aberg@nwlink.com](mailto:aberg@nwlink.com)  
7 Attorney for Plaintiff Rebecca Chan

8  
9 /s/ Karen P. Kruse

10 Karen P. Kruse, WSBA #19857  
11 Karen Kruse Law, PLLC  
12 P.O. Box 99556  
13 Seattle, WA 98139-0556  
14 Email: [k2@KarenKruseLaw.com](mailto:k2@KarenKruseLaw.com)  
15 Attorney for Defendant Secure Freight Systems (U.S.A.), Inc.

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18 Kit Bonnie Chu, Individually  
19 13700 Mayfield Place #1130  
20 Richmond BC V6V 2E4  
21 Canada  
22 Unserved Defendant Kit Bonnie Chu

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25 Maple Freight Partnership

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Kit Bonnie Chu, President A2338 Enterprises, Inc.  
13700 Mayfield Place #1130  
Richmond BC V6V 2E4  
Canada  
Unserved Defendant, Maple Freight Partnership

1                   **II. DECLARATION OF KIT BONNIE CHU**

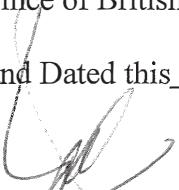
2                   I, Kit Bonnie Chu, being first duly sworn declare under penalty of perjury under the laws of  
3                   the United States of America, Canada and the province of British Columbia that the foregoing is  
4                   true and correct:

- 5                   1. I am over eighteen years of age and I have been named as an individual defendant in the  
6                   above captioned lawsuit.
- 7                   2. On my own behalf, I hereby agree to accept service of process in this matter by registered  
8                   mail at my residence, 1196 55<sup>th</sup> Avenue West, Vancouver, BC V6P 7A1 Canada,  
9                   pursuant to Article 10(a) of the Hague Convention on the Service Abroad of Judicial and  
10                  Extrajudicial Documents (“Hague Convention”).
- 11                  3. In regard to Maple Freight Partnership, I hereby affirm that A2338 Enterprises, Inc., is a  
12                  general partner of Maple Freight Partnership; that I am the President of A2338  
13                  Enterprises, Inc.; and that I have been duly authorized by Maple Freight Partnership and  
14                  its two (2) general partners (A2338 Enterprises, Inc. and Aero BC Enterprises, Inc.) to  
15                  accept service of process by registered mail pursuant to Article 10(a) of the Hague  
16                  Convention.
- 17                  4. On behalf of Maple Freight Partnership, I hereby agree to accept service of process in this  
18                  matter by registered mail at 13700 Mayfield Place #1130, Richmond, BC V6 V2EF,  
19                  Canada, pursuant to Article 10(a) of the Hague Convention.
- 20                  5. On behalf of A2338 Enterprises, Inc., I hereby agree to accept service of process in this  
21                  matter by registered mail at Suite 500 North Tower, 5811 Cooney Rd., Richmond, BC  
22                  V6X 3M1, which is the Registered Agent for A2338 Enterprises, Inc., pursuant to Article  
23                  10(a) of the Hague Convention.
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- 1       6. In the event that any of the parcels identified in above Paragraph 2, 4 and 5 are returned  
2                  unclaimed or without signature, I agree to accept service of process by UPS delivery at  
3                  the addresses identified in above Paragraph 2, 4 and 5 on behalf of myself, Maple Freight  
4                  Partnership and A2338 Enterprises, Inc., pursuant to Article 10(a) of the Hague  
5                  Convention.  
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7       7. On behalf of myself, Maple Freight Partnership and A2338 Enterprises, we hereby affirm  
8                  and warrant that we will not challenge the sufficiency of service of process as outlined in  
9                  the Court's Order proposed below.

10                  I declare under penalty of perjury of the laws of the United States of America, Canada  
11                  and the province of British Columbia that the foregoing is true and correct.  
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13                  Signed and Dated this 18 day of November, 2022 at Richmond, BC.  
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### III. ORDER

This Matter, having come before the Court on the parties' Stipulation and the Declaration of  
Kit Bonnie Chu,

IT IS HEREBY ORDERED that Plaintiff is hereby authorized to effect alternative means of service of process upon Defendant Kit Bonnie Chu and Maple Freight Partnership under FRCP Rule 4(f)(3) and Article 10(a) of the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents (“Hague Convention”) by Registered Mail as follows:

1. Kit Bonnie Chu, 1196 55<sup>th</sup> Avenue West, Vancouver, BC, V6P 7A1, Canada.
  2. Maple Freight Partnership, c/o Kit Bonnie Chu, 13700 Mayfield Place #1130, Richmond, BC V6 V2EF, Canada.
  3. Maple Freight Partnership, c/o A2338 Enterprises, Inc., Suite 500 North Tower, 5811 Cooney Rd., Richmond, BC V6X 3M1, Canada.

IT IS FURTHER ORDERED that in the event any of the registered parcels are returned unclaimed or without signature, the Plaintiff is hereby authorized to effect service of process by UPS delivery at the addresses listed in Paragraph 1-3 above, pursuant to FRCP Rule 4(f)(3) and Article 10(a) of the Hague Convention.

IT IS FURTHER ORDERED that this Order shall not prohibit Plaintiff from also effecting service upon the Defendants by any other means authorized by the FRCP or the Hague Convention.

IT IS FURTHER ORDERED that this Order supersedes the Court's November 15, 2022 Order (Docket #16), which shall have no further force and effect after entry of this Order. The Clerk of the Court is directed to enter a Minute Order to that effect.

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**ENTERED** this 22nd day of November 2022.

John H. Chase

The Honorable John H. Chun  
United States District Judge

## Presented By:

/s/ Alex Buerger

Alex Buerger, WSBA #25014  
Attorney for Plaintiff Rebecca Chan

Copy Received; Notice  
Of Presentation Waived:

/s/ Karen P. Kruse

Karen P. Kruse, WSBA #19857  
Attorney for Defendant Secure Freight Systems (U.S.A.), Inc.

Kit Bonnie Chu, Individually  
Unserved Defendant

Kit Bonnie Chu, President A2338 Enterprises, Inc.  
Maple Freight Partnership  
Unserved Defendant